# **COPA Innovation Laboratories — Privacy Policy**

**Last Updated: January 2025** 

COPA Innovation Laboratories ("COPA Labs," "we," "us," or "our") respects your privacy and is committed to protecting any personal information we collect through our website, **copainnovationlabs.com** (the "Website"). This Privacy Policy explains what information we collect, how we use it, how we protect it, and your rights under applicable law.

By using the Website, you agree to this Privacy Policy.

#### 1. Information We Collect

We collect personal information in two primary ways:

#### A. Information You Provide Directly

When you contact us via email, contact or inquiry forms, newsletter sign-ups, or other interactive features (e.g., service inquiries, partnership requests), you may provide:

- Name
- Email address
- Phone number (optional)
- Company, organization, or affiliation (if provided)
- Message content / inquiry details
- Any other information you choose to supply (e.g., project descriptions, comments, requests)

This information is used solely to respond to your inquiry, facilitate communications, provide requested information, or otherwise perform the service you requested.

## **B.** Information Collected Automatically

When you visit or use the Website, we may automatically collect certain technical and usage data, including:

• IP address (which may be anonymized/truncated when feasible)

- Browser type, device type, and operating system
- Pages you visit, date/time of visit, and time spent on pages
- Referring website or search engine that brought you to our Website
- Click behavior, navigation patterns, and aggregate usage statistics

We collect this data using first-party cookies and privacy-focused analytics tools. We do **not** use third-party ad trackers or behavioral profiling tools unless you are explicitly informed otherwise.

## 2. How We Use Your Information

We may use the information collected for the following purposes:

- To respond to your inquiries, requests, or messages
- To provide the services or information you request (e.g., partnership info, project inquiries, documentation)
- To administer, maintain, and improve our Website (e.g., performance analysis, security, site optimization)
- To comply with legal or regulatory obligations and to protect our rights, property, and users
- To monitor, detect, and prevent fraud or other unauthorized behavior

We do **not** use or share your personal information for advertising, marketing, retargeting, profiling, or sale, unless we obtain your explicit consent.

## 3. How We Share Information

COPA Labs shares personal information only in limited circumstances:

- **Service Providers & Vendors** We may disclose data to third-party vendors who perform services on our behalf (hosting, analytics, security, support). These providers are contractually prohibited from using data for their own marketing or data resale.
- **Legal Compliance** We may disclose information if required by law, regulation, subpoena, court order, or governmental request; to protect our rights or safety; or to respond to legal claims.
- **Business Transfers** In the event of a merger, acquisition, reorganization, or sale of COPA Labs (or its assets), user data may be transferred under confidentiality protections.
- With Your Consent We may share certain information if you explicitly authorize us to.

We do **not** sell or "share" personal information for cross-context behavioral advertising or data broker purposes.

## 4. Cookies & Tracking Technologies

We use minimal, privacy-focused cookies for purposes such as:

- Site functionality and security
- Usage analytics and performance monitoring
- Session management (for logged-in or interactive site features)

We do **not** use tracking cookies for advertising, behavioral profiling, or cross-site tracking unless explicitly disclosed.

You can disable cookies via your browser settings — however, this may affect some features or functionality of the Website.

#### 5. Data Retention

We retain personal information only as long as necessary to:

- Fulfill the purpose for which it was collected (e.g., respond to inquiry)
- Provide requested services or support ongoing communications
- Meet legal, regulatory, tax, or record-keeping obligations

When information is no longer needed, we will either delete it or anonymize it, unless retention is required for legitimate business or legal purposes.

# 6. Your Rights under California & U.S. Privacy Laws

If you are a resident of California, you have additional rights under CCPA/CPRA:

- **Right to Know** You can request details about what personal information we have collected about you, sources, purposes of collection, and categories of third parties (if any) with whom we have shared it. (California DOJ Attorney General)
- Right to Delete You may request deletion of personal information we hold about you, subject to certain legal and business-necessary exceptions. (<u>California DOJ Attorney</u> General)
- **Right to Correct** You may request correction of any inaccurate personal information we have about you. (California DOJ Attorney General)
- **Right to Opt-Out of Sale or Sharing** We do not sell or share personal information for advertising or data-broker purposes. (<u>California DOJ Attorney General</u>)

- **Right to Limit Use of Sensitive Personal Information** We do not collect or process sensitive personal information for profiling or marketing. (<u>California DOJ Attorney General</u>)
- **Right to Non-Discrimination** Exercising your privacy rights will not result in different service levels or denial of service. (California DOJ Attorney General)

#### **How to Exercise These Rights**

You can send a request at any time to:

#### **COPA Innovation Laboratories**

Address: 150 North Wiget Lane, Suite 250, Walnut Creek, CA 94598

Phone: 925-933-4000

Email: charliec@copastc.com

We may request verification of your identity (or authorized agent) before fulfilling requests.

## 7. Data Security

We take commercially reasonable and appropriate administrative, technical, and organizational measures to protect personal information from unauthorized access, disclosure, alteration, or destruction. Measures may include secure servers, encryption, access controls, and regular security reviews. (BBB)

However, no security system is impenetrable. By using our Website, you acknowledge this limitation and accept the inherent risk.

## 8. Children's Privacy

The Website is not directed to children under 16 years old. We do **not** knowingly collect personal information from children under 16. If you believe a child under 16 has provided personal information, please contact us, and we will promptly work to delete that information.

## 9. Third-Party Websites & External Services

Our Website may link to external websites or third-party services (e.g., partners, vendors, resources). We are not responsible for their privacy practices, policies, or content. We encourage you to review the privacy policies of any external site before providing personal information.

## 10. Limitation of Liability

To the fullest extent permitted by law:

- COPA Labs and its affiliates, officers, employees, and agents are not liable for damages arising from unauthorized access, data breaches, technical failures, or events beyond reasonable control.
- We cannot guarantee perfect security or uninterrupted operation of the Website.
- Your use of the Website and any personal information you provide is at your own risk.

This limitation does not waive rights afforded to you by applicable privacy law.

## 11. Changes to This Privacy Policy

We may update this Privacy Policy over time to reflect changes in laws, business practices, technologies, or services. When changes occur, we will update the "Last Updated" date at the top of this page.

We encourage you to review this policy periodically. Continued use of the Website after updates indicates acceptance of the revised policy. (<u>Usercentrics</u>)

## 12. Contact Information

If you have questions about this Privacy Policy or our privacy practices, or if you wish to exercise your rights, please contact us:

#### **COPA Innovation Laboratories**

Address: 150 North Wiget Lane, Suite 250, Walnut Creek, CA 94598

Phone: 925-933-4000

Email: charliec@copastc.com